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January 26, 2018

VIA CM/ECF

The Honorable William F. Kuntz, II
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Tara Lenich, No. 1:17-cr-00154-WFK

Dear Judge Kuntz,

We represent defendant Tara Lenich the above captioned proceeding. Given the length of time that has passed following the submission of our sentencing memorandum, we write to provide the Court with certain updated information.

In the time since our prior submission, Tara has been officially disbarred in New York and disbarment proceedings have commenced in Connecticut as well. *See Exhibit 1.* Tara has continued her volunteer work with her parish at Christ Church as well as her work with veterans. She has finished additional coursework through the University of Phoenix Small Business and Entrepreneurship Certificate Program. *See Exhibit 2.* As we noted in our prior submission, Tara is working towards this Certificate in order to pursue an MBA and start her own business related to training service dogs for visits to veterans' and children's hospitals.

As we noted in our prior submission, Tara was an enthusiastic participant in the Focus Forward Project. Following her graduation from the program, and since our prior submission, Tara has continued to volunteer with Focus Forward, including mentoring another participant. In the words of Focus Forward's Interim director, Joel Putnam,

Since graduating from our class, Ms. Lenich reached out to us to see if she could assist us with any of our future classes. She was paired with a current participant on bail who was unable to attend several classes while she cared for a dying relative. Ms. Lenich provided detailed summaries of the work that the participant had missed, including offering help with a public speaking assignment as well as offering to look over the participant's resume and give feedback. More importantly however, she provided an emotional voice and support to someone in our program who was having a tough time. We've been particularly impressed by her initiative, work ethic, and determination to help those she can help.

Letter of Focus Forward, Exhibit 3 at 2.



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In addition to Tara's work with Focus Forward, and as part of Tara continued search for ways she can use her skills to give back to her community, Tara has begun meeting with Ivy Woolf Turk, the founder of Project Liberation. Project Liberation works with women in all stages of the criminal justice system using "trauma-informed healing modalities" to "increase confidence and self-esteem, and strengthen their ability to develop options and strategies to overcome difficulties, resolve problems, and make life-affirming decisions." Letter of Ivy Woolf Turk, Exhibit 4 at 2. Project Liberation's goal is to decrease the female recidivism rate by giving women the tools they need to succeed outside of prison. *Id.* Even though their relationship is relatively new, Tara's professionalism and dedication have made such an impression Ms. Woolf Turk, that she has offered Tara the opportunity to perform community service with Project Liberation should Your Honor's sentence allow. Tara's work with Focus Forward and her potential work with Project Liberation are important examples of the ways in which Tara could positively impact her community in lieu of incarceration.

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Morris J. Fodeman
Morris J. Fodeman

Cc: All Counsel of Record (via CM/ECF)